

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(CHARLESTON DIVISION)**

IN RE APPLICATION OF RIVADA  
NETWORKS FOR AN ORDER PURSUANT  
TO 28 U.S.C. § 1782 TO CONDUCT  
DISCOVERY FOR USE IN A FOREIGN  
PROCEEDING,

*Petitioner.*

Case No. 2:16-mc-00473-DCN

**DECLARATION OF DOMINIC A.  
STARR, ESQ., IN SUPPORT OF  
RIVADA NETWORKS' MOTION TO  
COMPEL COMPLIANCE WITH  
DEPOSITION SUBPOENA**

I, Dominic Allen Starr, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly admitted to practice law in the State of South Carolina and admitted to practice before this Court. I am a partner in the law firm of McAngus Goudelock & Courie, and counsel for Rivada Networks ("Petitioner") in this proceeding. I respectfully submit this declaration in support of Rivada Networks' Motion to Compel Compliance with Deposition Subpoena. I have personal knowledge of the facts set forth herein, unless stated otherwise.

2. I have reviewed the Motion and the accompanying memorandum of law, and other papers filed concurrently herewith. As set forth herein, Petitioner seeks an order compelling Mr. Rick Keith's compliance with a deposition subpoena issued in the above-captioned proceedings.

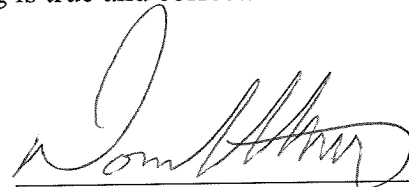
3. Attached hereto as Exhibit A is a Proposed Order granting Rivada Networks' Motion to Compel Compliance with Deposition Subpoena.

4. Attached hereto as Exhibit B are true and correct copies of the briefs filed, and the order entered, in connection with Rivada Networks' motion to compel Mr. Brett Haan's compliance with a deposition subpoena issued from the United States District Court for the Eastern District of Virginia.

5. Attached hereto as Exhibit C are true and correct copies of the two subpoenas served on Mr. Keith, through counsel, in connection with the above-captioned proceeding.

6. Attached hereto as Exhibit D is a true and correct copy of an email from Ms. Molly Craig, Esq., counsel for Mr. Keith, in which Ms. Craig acknowledges service of the subpoenas.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Myrtle Beach, South Carolina on December 20, 2016.



Dominic Allen Starr, Esq.